



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

April 30, 2007

Reply To
Attn Of: ETPA-088

Ref: 05-037-AFS

Mr. Forrest Cole, Forest Supervisor
U.S. Forest Service, Tongass National Forest
648 Mission Street
Ketchikan, Alaska 99901

Dear Mr. Cole:

The U.S. Environmental Protection Agency (EPA) has reviewed the **final Environmental Impact Statement (EIS) and Record of Decision (ROD) for Scratchings Timber Sale (CEQ No. 20070108)** in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA rated the draft EIS and preferred alternative as EC-2 (Environmental Concerns, Insufficient Information). EPA expressed environmental concerns with the preferred alternative (Alternative 3) in the draft EIS based on the potential for cumulative adverse impacts on water quality and high quality salmon fisheries. In addition, we requested that the Forest Service (FS) discuss the feasibility of avoiding timber harvest in the Dolores watershed in the final EIS. We recommended selection of Alternative 4 since it would meet the purpose and need while causing fewer environmental impacts than Alternative 3. Additionally, this alternative would allow the streams in the Dolores Watershed to recover more fully prior to future harvests because of reduced timber harvest and road construction.

The FS has selected a modified Alternative 3 for the final EIS and ROD. This alternative emphasizes economic timber harvest within the constraints of the Forest Plan standards and guidelines by maximizing timber volume to the extent that a reasonable economic timber harvest can be achieved. Under the modified alternative, up to 25 MMBF of timber will be harvested from approximately 1,376 acres. There would be approximately 5 miles of temporary roads and 7 miles of FS road constructed. All newly built roads and about 11 miles of existing FS road would be decommissioned or placed in storage under this modified alternative, however, and approximately 10 miles of existing roads would remain open. Lastly, the small old-growth reserves were modified under the selected alternative to meet Forest Plan standards and guidelines as recommended by an interagency group.

We appreciate the FS's consideration of our comments. The Response to Comments appendix in the Final EIS (Appendix B) and ROD contains the FS's rationale as to why Alternative 4 was not selected, primarily because of adverse impacts to project economics, as well as the conclusion that impacts to water quality and fish habitat in the project area, including

the Dolores watershed, will only be temporary and will not exceed State of Alaska standards. Based on our review of the Final EIS and ROD, we have determined that the major issues associated with the selection of Alternative 3 remain, and we continue to have the same concerns with the selected alternative that we discussed in our Draft EIS comment letter.

Thank you for the opportunity to comment on the final EIS. Please feel free to contact Jennifer Curtis of my staff at (907) 271-6324 or by electronic email at curtis.jennifer@epa.gov with any questions that you may have.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit

cc: Dennis Sylvia, Thorne Bay Ranger District, Tongass National Forest